

**WEIL, GOTSHAL & MANGES LLP**

Stephen Karotkin (*pro hac vice*)  
(stephen.karotkin@weil.com)  
Ray C. Schrock, P.C. (*pro hac vice*)  
(ray.schrock@weil.com)  
Jessica Liou (*pro hac vice*)  
(jessica.liou@weil.com)  
Matthew Goren (*pro hac vice*)  
(matthew.goren@weil.com)  
New York, NY 10153-0119  
Tel: (212) 310-8000  
Fax: (212) 310-8007

**KELLER & BENVENUTTI LLP**

Tobias S. Keller (#151445)  
(tkeller@kellerbenvenutti.com)  
Jane Kim (#298192)  
(jkim@kellerbenvenutti.com)  
650 California Street, Suite 1900  
San Francisco, CA 94108  
Tel: (415) 496-6723  
Fax: (415) 636-9251

*Attorneys for Debtors and Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION,**

**- and -**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

- ☐ Affects PG&E Corporation  
☒ Affects Pacific Gas and Electric Company  
☐ Affects both Debtors

*\* All papers shall be filed in the lead case,  
No. 19-30088 (DM)*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11  
(Lead Case) (Jointly Administered)

**STIPULATION AMONG DEBTORS,  
CREDITORS COMMITTEE, AND MNOC  
AERS LLC EXTENDING TIME TO  
RESPOND TO MOTION AND  
MEMORANDUM OF POINTS AND  
AUTHORITIES OF MNOC AERS LLC  
FOR ENTRY OF AN ORDER  
CONFIRMING SAFE HARBOR  
PROTECTION UNDER 1 U.S.C. §§  
362(B)(6) AND 556**

Re: Dkt. No. 1599

[No Hearing Requested]

1 This stipulation and agreement for order (“**Stipulation and Agreement for Order**”) is  
2 entered into by (a) PG&E Corporation and Pacific Gas and Electric Company, as debtors and  
3 debtors in possession (collectively, the “**Debtors**”), (b) the Official Committee of Unsecured  
4 Creditors (the “**Creditors Committee**”), and (c) mNoc AERS LLC (“**mNOC**”). The Debtors,  
5 the Creditors Committee, and mNoc are referred to in this Stipulation and Agreement for Order  
6 collectively as the “**Parties**,” and each as a “**Party**.” The Parties hereby stipulate and agree as  
7 follows:

8 **RECITALS**

9 A. On April 22, 2019, mNoc filed the *Motion and Memorandum of Points and*  
10 *Authorities of mNoc AERS LLC for Entry of an Order Confirming Safe Harbor Protection Under*  
11 *1 U.S.C. §§ 362(b)(6) and 556* (redacted version [Dkt. No. 1599] (the “**mNoc Safe Harbor**  
12 **Motion**”), which is set for a hearing before the Court at 9:30 a.m. on May 21, 2019. Any  
13 response or opposition to the mNoc Safe Harbor Motion is due by 4:00 p.m. (Pacific Time) on  
14 May 7, 2019.

15 B. Counsel for the Debtors and the Creditors Committee have requested, and counsel  
16 for mNoc has agreed, that the time for the Debtors and the Creditors Committee to respond to the  
17 mNoc Safe Harbor Motion be extended.

18 **NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE**  
19 **INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT HEREBY IS**  
20 **STIPULATED AND AGREED, BY AND AMONG THE PARTIES, THROUGH THE**  
21 **UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THE COURT TO ORDER,**  
22 **THAT:**

23 1. The time for the Debtors and the Creditors Committee to file and serve any  
24 response or opposition to the mNoc Safe Harbor Motion is extended through 4:00 p.m. (Pacific  
25 Time) on May 14, 2019.

26 *[Signatures on next page]*  
27  
28

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Dated: May 6, 2019

KELLER & BENVENUTTI LLP

/s/ Jane Kim  
Jane Kim

*Attorneys for Debtors  
and Debtors in Possession*

Dated: May 6, 2019

MILBANK LLP

/s/ Thomas R. Kreller  
Thomas R. Kreller

*Attorneys for Official Committee of  
Unsecured Creditors*

Dated: May 6, 2019

ORRICK, HERRINGTON &  
SUTCLIFFE LLP

/s/ Thomas C. Mitchell  
Thomas C. Mitchell

*Attorneys for mNoc AERS LLC*